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IN THE
UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JUN 28 2001

MARY E. D'ANDREA, GLE
Per Deputy Clerk

WILLIAM DONALD MARSHALL,
PETITIONER, Civil # 1:CV-01-0949

VS.

ROBERT L. RAIGER,
RESPONDENT, J Lombo
MOTION FOR
COURT TO SUSTAIN
ORDER OF JUNE 14,
2001

By ORDER OF this Honorable Court dated JUNE 14, 2001
PETITIONER'S MOTION FOR EXTENSION OF TIME TO
ANSWER RESPONDENT'S REPLY WAS GRANTED AFFORDING
PETITIONER UNTIL July 11, 2001 with which to FILE his
ANSWER TO RESPONDENT'S REPLY, AND PETITIONER will
SO COMPLY with this Court's ORDER ON OR BEFORE SAID
DATE.

PETITIONER FINDS VITAL NEED TO FILE THIS INSTANT

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MOTION IN VIEW THAT AS ASSERTED IN PETITIONER'S
PETITION FOR WRIT OF HABEAS CORPUS ON PAGE 4
PARAGRAPH 6 PETITIONER HAS LEARNED FROM RESPONDENT'S
AGENT TRAVIS L. SOUNDERS, COUNTY DETECTIVE FOR THE
LEBANON COUNTY DISTRICT ATTORNEY'S OFFICE THAT
SUGGEST BY HIS OFFICE SENDING COPY OF GOVERNOR'S
WARRANT SERVED UPON PETITIONER THIS DATE, TO THIS
HONORABLE COURT IN EFFORT TO SEEK A DISMISSAL OF
PETITIONER CASE BEFORE THIS COURT BEFORE HE HAS HAD
OPPORTUNITY TO TIMELY FILE HIS REPLY ON OR BEFORE JUNE
11, 2001 AS THE COURT GRANTED. A DISMISSAL WOULD NOT
ONLY PRECLUDE PETITIONER FROM FAIRLY BEING HEARD OF
FACTUAL ISSUES THAT WILL PROVE BY TESTIMONY OF
LEBANON COUNTY PUBLIC DEFENDER SCOTT STEIN

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ON RECENTLY ASSIGNED TO PETITIONER'S CASE IN STATE COURT AFTER NUMEROUS STATUTORY RIGHTS WERE VIOLATED IN COURSE OF ATTEMPTING TO EXTRADITE PETITIONER WITHOUT ANY TIMELY PRETRANSFER HEARING, EVIDENCE TO THIS CLAIM will BE SUBMITTED IN PETITIONER'S REPLY DUE JULY 11, 2001.

PETITIONER TOO HAS LEARNED BY DETECTIVE SOUNDERS THAT ACQUIRING THIS COURT'S EARLY DISMISSAL PRIOR TO PETITIONER'S FILING OF REPLY BY JULY 11, 2001 WOULD TOO CAUSE THIS COURT'S ORDER OF JUNE 5, 2001 AT PARAGRAPH '4' TO BE LIFTED ALLOWING SWIFT REMOVAL OF PETITIONER TO VA. AUTHORITIES EVEN PRIOR ALSO TO SEEKING ANY STATE OR FEDERAL APPEALS AS MATTER OF RIGHT,

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IN THE EVENT THIS HONORABLE COURT WOULD
DISMISS PETITIONER'S PETITION PRIOR OR SUBSEQUENT
TO JULY 11, 2001, IN ORDER TO PRESERVE AND PROTECT
PETITIONER'S RIGHT TO APPEAL, PETITIONER RESPECT-
FULLY SEEKS IN THE COURT'S FINAL ORDER, THAT
PARAGRAPH 4 OF THIS COURT'S ORDER DATED JUNE 5,
2001, REMAINS IN EFFECT WHILE PETITIONER SEEKS
APPELLATE REVIEW, RESPECTFULLY.

RESPECTFULLY SUBMITTED,

William Donald Marshall
Petitioner, Pro Se.

DATED THIS 26th DAY OF JUNE, 2001.